

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

Gwen Glaze,)	
)	
Plaintiff,)	
)	
v.)	Case No. 6:17-cv-03081-SWH
)	
Robert Leonard)	
Animal Clinic & Equine Center, LTD,)	
)	
Defendants.)	

**CASE MANAGEMENT REPORT
AND
PROPOSED DISCOVERY SCHEDULE**

The parties are to submit the following Case Management Report and Proposed Discovery Schedule. The Court will then enter an order on CM/ECF as to whether the Proposed Discovery Schedule has been adopted. The Court will enter a separate Trial Order. Please affix counsels' and any pro se party's signatures before submission of the final Case Management Report and Proposed Discovery Schedule.

A. CASE MANAGEMENT REPORT

1. Pursuant to Federal Rule of Civil Procedure 26(f), the parties held a conference on May 31, 2017. Participants to the conference were *(lead trial counsel for each side should be identified with an asterisk after his or her name; if there is more than one plaintiff or defendant, please indicate the party whom the attorney represents)*:

Plaintiff(s): Christopher S. Swiecicki

Defendant(s): William Swain Perkins and Lauren Perkins Allen

2. The parties have developed a discovery plan pursuant to Federal Rule of Civil Procedure 26(f)(3).

3. Counsel for the parties do anticipate the disclosure or discovery of electronically stored information.

4. The parties do not anticipate that a request for a protective order will be made by one or both parties.
5. Initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure shall be completed no later than **July 14, 2017**.
6. The parties propose a trial date no earlier than **June 11, 2018**.
7. The parties anticipate the **jury** trial will last approximately **2-3 days**.
8. If the parties believe a scheduling conference should be held prior to the issuance of a scheduling order and/or a trial order, please provide at least three proposed dates for the scheduling conference: July 17, 2017; July 20, 2017; July 21, 2017.

B. DISCOVERY SCHEDULE

Pursuant to Rules 16(b) and 26(f), Federal Rules of Civil Procedure, and upon consideration of the parties' proposals in the matter, the following time schedule is established with respect to pretrial discovery, the joinder of additional parties, amendment of the pleadings, the filing of motions and certain additional matters.

1. **DISCOVERY** shall close as of **December 29, 2017**.
2. Any **MOTION TO JOIN ADDITIONAL PARTIES** shall be filed not later than
Click here to enter a date.. **30 days after receipt of initial disclosures**.
3. Any **MOTION TO AMEND PLEADINGS** shall be filed not later than Click here to enter a date.. **30 days after receipt of initial disclosures**
4. Any **MOTION TO COMPEL DISCOVERY** shall be filed prior to the time specified for the close of discovery, unless a response to a discovery request is not due until after said date, in which case a motion to compel with respect to that discovery request shall be filed within **ten (10)** days immediately after the response is made or is due (whichever is earlier).

Notwithstanding the above, no motion relating to a discovery dispute shall be filed until: (a) the counsel who believes there is a discovery dispute telephones the opposing

counsel to ascertain if there actually is a dispute; (b) counsel determine that they cannot resolve the dispute; and (c) counsel telephone the undersigned's office (816-512-5775) to request a telephone conference. Any discovery motion filed without complying with this procedure will be denied.

5. DISPOSITIVE MOTIONS

- a. All **DISPOSITIVE MOTIONS** shall be filed on or before **January 11, 2018**.
- b. **OPPOSITION** to any dispositive motions shall be filed by **February 11, 2018**.
- c. **SUGGESTIONS IN REPLY** shall be filed by **March 9, 2018**.

6. DISCLOSURE OF EXPERT TESTIMONY

a. With respect to a party who intends to call an expert for the purpose of supporting an affirmative claim for relief, disclosure of expert testimony shall be filed not later than **August 11, 2017**.

With respect to a party who intends to call an expert for the purpose of defending against an affirmative claim for relief, disclosure of expert testimony shall be filed not later than **October 2, 2017**

b. Each party shall disclose to every other party any evidence that the party may present at trial under Rules 702, 703 or 705, Federal Rules of Evidence. This disclosure shall be in accordance with the requirements of Rule 26(a)(2), Federal Rules of Civil Procedure.

c. If any party, after receiving the reports described above in subparagraphs 6(a) and (b) from an opposing party, wishes to submit evidence intended solely to contradict or rebut evidence on the same subject matter, they may do so in the same manner described above on or before **November 13, 2017**. Thereafter, each party's expert witness shall only be permitted to testify at trial as to the opinions filed under this paragraph.

d. Please select one of the options below and provide the necessary information:

☐ The parties do not anticipate any challenges to the reliability or relevancy of any expert's testimony.

☐ Any challenges to the reliability or relevancy of the expert's testimony shall be filed not later than **November 13, 2017**.

e. Please select one of the options below and provide the necessary information:

☒ The parties do not anticipate the need for any physical or mental examination pursuant to Federal Rule of Civil Procedure 35.

☐ Physical or mental examinations pursuant to Federal Rule of Civil Procedure will be completed on or before [Click here to enter a date..](#)

APPROVED:

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